

EXHIBIT A



ALABAMA CENTER FOR COMMERCE
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Charles A. Stewart III

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August 11, 2006

Via Facsimile Transmission

K. Stephen Jackson, Esq.
Joseph L. "Josh" Tucker, Esq.
Joel L. DiLorenzo, Esq.
Jackson & Tucker, P.c.
Black Diamond Building
2229 First Avenue North
Birmingham, AL 35203

Walter B. Calton, Esq.
312 East Broad Street
Eufaula, AL 36027

RE: *David Finney v. Nissan North America, Inc.; Takata U.S.A. Corporation d/b/a Takata Corporation; et al.*

Gentlemen:

Two days ago I spoke with Stephen Jackson. Joel DiLorenzo also called me, but we traded voicemail messages. The purpose of this letter is to address the fact that Plaintiff has sued five Takata entities or former entities. None of these entities or former entities manufactured the seat belts which appear in the subject 1992 Nissan Sentra. A Japanese corporation manufactured the seat belts at that time. Please dismiss the five incorrectly sued entities so it will be unnecessary to file motions to dismiss and to compile the necessary evidentiary material.

Steve asked me if we could accept service for Takata Corporation. I have been authorized to accept service for Takata Corporation, **but only** if Plaintiff will agree to the following terms:

1. Takata Corporation will have 60 additional days to respond to any discovery;
2. Any 30(b)(5) & (6) notice addressed to Takata Corporation will issue at least 90 days before a mutually agreed upon date;
3. Takata Corporation will have 90 days to respond and object to any document request that accompanies the 30(b)(5) & (6) notice;
4. The 30(b)(5) & (6) witness for Takata Corporation will take place in Los Angeles, California; and
5. Plaintiff will dismiss all the incorrectly sued entities and former entities.

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If Plaintiff is willing to accept these terms, then Takata Corporation will waive service under the Hague Convention and I will be authorized to accept service on Takata Corporation's behalf.

Please let me know if these terms are acceptable. As you know, our motions to dismiss are due Monday. As a result, it is important to have an answer to this letter by the close of business today.

I look forward to hearing from you.

Yours very truly,

Dictated and sent in absence in order to avoid delay.

Charles A. Stewart III

CAS/arm



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October 30, 2006

K. Stephen Jackson, Esq.
Joseph L. "Josh" Tucker, Esq.
Joel L. DiLorenzo, Esq.
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Black Diamond Building
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312 East Broad Street
Eufaula, AL 36027

RE: *David Finney v. Nissan North America, Inc.; Takata U.S.A. Corporation d/b/a Takata Corporation; et al.*

Gentlemen:

I received discovery issued to Takata Inc. This is a Japanese company and they do not have commas in their language so it is Takata Inc., Takata North American Inc., Takata Seat Belts Inc., Takata Restraint Systems Inc., and Takata USA Coporation. I am sending this letter to you to remind you that none of these Defendants played a role in the manufacture or design of any seat belt that was installed in a Nissan Sentra back in 1992.

I can assure you that none of these entities are doing business as Takata Corporation. Since I have already explained this to you, I wonder why you want me to go to the time and expense of responding to this discovery. Please let me know if it is your intention to put my clients to that expense. We may need to file something with the Court.

Please provide me with the text of the label on the seat belt in the subject vehicle **and** the information on the vehicle placard.

I look forward to your response.

Yours very truly,

Charles A. Stewart III

CAS/arm

cc: Angela R. Rogers, Esq.



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November 21, 2006

Via facsimile

Joel L. DiLorenzo
Jackson and Tucker, P.C.
Black Diamond Building
2229 First Avenue North
Birmingham, AL 35203

RE: David Finney v. Nissan North America, Inc., et al.

Dear Joel:

Thank you for your letter of November 14, 2006. Please accept this letter in response.

With respect to the Takata entities which are currently sued in this matter, they have no information responsive to either interrogatories or requests for production. We will file responses and objections to those discovery requests within the time permitted under the rules. I take it by your letter of November 14 that you are not going to withdraw this discovery, even though we have advised you and your partners that these Takata entities had nothing to do with the vehicle that is the subject of this lawsuit.


With respect to the discovery to Takata Corporation, we feel that it is possible to draft 25 interrogatories that cover the field of issues involving the subject vehicle. Takata Corporation, once properly served, will file responses and objections, if appropriate, to the best of Takata Corporation's ability in compliance with the Federal Rules of Civil Procedure. Takata Corporation may object to certain items of discovery.

We understand that you have already placed into action the steps necessary to serve Takata Corporation pursuant to the Hague Convention. Once served, Takata Corporation will file responsive papers within the time allowed.

I hope this answers your questions. If you have any further matters you wish to discuss, please do not hesitate to let me know.

Joel L. DiLorenzo
November 21, 2006
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Yours very truly,

A handwritten signature in black ink that reads "Charles A. Stewart III". The signature is written in a cursive style with a large, stylized "C" and "S".

Charles A. Stewart III

CAS/dda

cc: Angela R. Rogers, Esq.
Robert C. Khayat, Jr., Esq.